

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-00957-SDJ

**SUPPLEMENTAL DECLARATION OF E. KATE PATCHEN IN SUPPORT OF
NON-PARTY META PLATFORMS, INC.’S MOTION FOR A PROTECTIVE ORDER**

Pursuant to 28 U.S. Code § 1746, I, E. Kate Patchen, hereby declare and certify:

1. I am over 18 years of age, and I am fully competent to make this Declaration. I have personal knowledge of the facts stated, and they are all true and correct.
2. I am counsel to non-party Meta Platforms, Inc. (“Meta”) in relation to the above captioned case.
3. State Plaintiffs’ desire that Meta “conduct additional review to confirm which documents are relevant to this action,” Request for Extension of Time, Dkt. 532 ¶ 4, would require Meta to review over thirteen million pages of documents, some of which Meta produced to the U.S. Department of Justice (“DOJ”) as many as four years ago.
4. During meet and confers with State Plaintiffs, I stated to State Plaintiffs that Meta could not swear under oath to the relevance of millions of pages of documents at issue without first reviewing the documents.

5. In response to the CID issued by the DOJ to Meta on October 20, 2020, Meta produced documents bearing Bates numbers FBDOJGOOG_00941457 through FBDOJGOOG_01494560.

6. On April 23, 2024, Meta produced to State Plaintiffs documents bearing Bates numbers FBDOJGOOG_00000001 through FBDOJGOOG_01494984. This production to State Plaintiffs included the documents Meta produced to the DOJ in response to the October 20, 2020 CID.

Meta also produced data files from the October 20, 2020 CID to Texas in response to its Investigative Demand in 2020.

7. Prior to the date on which State Plaintiffs filed their Opposition, Meta provided State Plaintiffs with a draft declaration in which Meta explained that it had already produced to State Plaintiffs, on April 23, 2024, the documents Meta produced to the DOJ in response to the October 20, 2020 CID.

8. Meta has provided State Plaintiffs with multiple hours of deposition testimony, consisting of 10 hours of corporate testimony in this matter, 14 hours of corporate testimony in *United States v. Google LLC*, No. 1:23-cv-000108 (E.D. Va.), and related individual testimony from the DOJ's investigation of Google.

Executed on July 22, 2024.

By: /s/ E. Kate Patchen
E. Kate Patchen